

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF MINNESOTA**

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Jennifer Schaadt,

Plaintiff,

v.

**PLAINTIFF'S MOTION TO  
COMPEL DISCOVERY**  
Civil No. 05-CV-01167 (RHK/JSM)

St. Jude Medical S.C., Inc.

Defendant.

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TO: DEFENDANT AND ITS ATTORNEY, Laura McKnight, Bassford Remele,  
P.A., 33 South 6<sup>th</sup> Street, Suite 3800, Minneapolis, MN 55402-3707

Plaintiff Jennifer Schaadt moves the Court for a hearing on her motion to compel outstanding discovery. This motion is based on the arguments of counsel, the accompanying memorandum of law, affidavits, and upon all of the files, records, and proceedings.

Dated: March 27, 2006

s/ Andrea Gesellchen  
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Andrea R. Gesellchen (#0320006)  
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